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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE EASTERN DISTRICT OF CALIFORNIA

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18
19 UNITED STATES OF AMERICA,) Case No. 2:24-cr-121-WBS
20 Plaintiff,)
21 v.) STIPULATION AND ORDER TO
22 JOSHUA DAVID PRICE,) CONTINUE STATUS CONFERENCE AND
23 Defendant.) EXCLUDE TIME
24) New Date: July 14, 2025
25) Time: 10:00 a.m.
26) Judge: Hon. William B. Shubb
27)
28)

19 IT IS HEREBY STIPULATED by and between the parties through their respective
20 counsel, ROGER YANG, Assistant United States Attorney, attorney for Plaintiff, and
21 RACHELLE BARBOUR, attorney for Defendant, JOSHUA DAVID PRICE, that the Status
22 Conference set for Tuesday, May 27, 2025, at 10:00 a.m., be continued to **Monday, July 14,**
23 **2025, at 10:00 a.m.** and that time be excluded for the reasons set forth below.

24 Defense Counsel has received significant discovery that is subject to a protective order
25 and must be reviewed personally with Mr. Price and cannot be left with him at the jail. This
26 additional discovery includes native files that must be played for Mr. Price at the jail.
27 Investigation is ongoing. Defense Counsel has been reviewing and analyzing the discovery,
28 conducting legal research, meeting with her client, and otherwise preparing for trial. The

1 Government has produced additional discovery relevant to an anticipated plea offer and native
2 files must be reviewed by defense counsel at the office of law enforcement. The above tasks are
3 ongoing, and the defense requires additional time to review discovery, discuss the case with her
4 client and the Government, and continue to prepare.

5 The parties believe that failure to grant the requested continuance would deny defense
6 counsel the reasonable time necessary for effective preparation, taking into account the exercise
7 of due diligence. Accordingly, the parties stipulate and request that the Court exclude time
8 between the date of the filing of this stipulation through the new status conference date of July
9 14, 2025 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the
10 ends of justice served by continuing the case as requested outweigh the interest of the public and
11 the defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 Dated: May 21, 2025 Respectfully submitted

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14 HEATHER E. WILLIAMS
Federal Public Defender

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16 */s/ Rachelle Barbour*
17 RACHELLE BARBOUR
Assistant Federal Defender
Attorneys for Defendant
JOSHUA DAVID PRICE

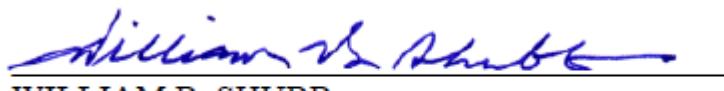
18 Dated: May 21, 2025 MICHELE BECKWITH
19 Acting United States Attorney

20
21 */s/ Roger Yang*
22 ROGER YANG
Assistant United States Attorney
Attorney for Plaintiff

23 **O R D E R**

24 The Court hereby adopts the new Status Conference date and excludes time for the
25 reasons set forth above under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

26 Dated: May 21, 2025

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28 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE